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**VIA ECF**

Magistrate Judge Sarah Netburn  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03-MDL-1570 (GBD)(SN)  
*Ashton et al. v. al Qaeda Islamic Army, et al.*, 02-cv-6977 (GBD)(SN)  
*Bauer et al. v. al Qaeda Islamic Army, et al.*, 02-cv-7236 (GBD)(SN)  
*Burlingame et al. v. Bin Laden, et al.*, 02-cv-7230 (GBD)(SN)

Dear Judge Netburn:

I am a Member of the Plaintiffs' Executive Committee, and submit this letter motion on behalf of the consolidated *Ashton* Plaintiffs in the above-named actions for whom final judgments are being sought against the Islamic Republic of Iran. Multiple motions seeking the entry of final judgments for economic losses on behalf of various groups of *Ashton* Plaintiffs have been filed on the Court's electronic docket in the three discreet actions referenced above. See ECF Nos. 5437, 5446, 5455, 5469, 5474, 5485, 5488, 5501, 5504, and 5535.

In support of these motions, counsel have submitted Declarations and other proofs relating to the economic losses suffered by plaintiffs' decedents' estates, including economic experts' reports and other supporting documentation, comprising thousands of pages in exhibits. See, e.g., ECF Nos. 5438, 5447, 5456, 5470, 5476, 5486, 5489, 5502, 5505, and 5537. Because of the sheer size of these exhibits and the confidential nature of certain information contained therein, including references to dates of birth throughout some of the information, as well as other personal identifying information, in accordance with Local ECF Rule 5.1 and this Court's Individual Rules of Practice, and consistent with the proposal made during the telephone conference with the Court on December 13, 2019 (concerning, among other things, the method for filing exhibits supporting economic loss claims), we respectfully request that in lieu of filing these voluminous documents in redacted form on the Court's electronic docket, we be granted leave to file the unredacted exhibits that represent their economic experts' findings on clearly marked discs with the Court. Courtesy copies of these motion papers, including their unredacted exhibits, have previously been or will promptly be furnished to chambers.



We have been advised by the Clerk's office that it cannot accept the exhibits on discs without an Order of the Court.

For the foregoing reasons, we respectfully ask that this Court so-order this request and allow exhibits including economic loss calculations and reports to be filed by disc with the Clerk of the Court.

Respectfully submitted,

/s/ Dorothea M. Capone  
Dorothea M. Capone

DMC:cml

cc: All MDL Counsel of Record (via ECF)